

# **EXHIBIT C**

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[REDACTED]

**From:** Kornobis, Ted [REDACTED]  
**Sent:** Monday, April 2, 2018 6:15 PM  
**To:** Hankey, Kyle (CRM) [REDACTED]; Pascucci, Michelle (CRM)  
[REDACTED]  
**Cc:** Topetzes, Stephen G. [REDACTED]  
**Subject:** Forefront - Update on Devices, Tenants, and Forefront Entities

Kyle and Michelle,

I am writing to provide certain updates and information with respect to Forefront.

First, please see below for a description of the devices and the non-Forefront entities and individuals that have or had workstations at Forefront's location. As I noted, Forefront is planning to soon move out of this space, and the tenants are also moving out.

The following Forefront computers have been collected from Forefront and have been imaged by Haystack:

1. Frank Argenziano
2. Unknown (believed to be Wendy Espinoza)
3. Michael Flatley
4. Alisa Rusanoff
5. Margaret Leszczynska
6. Margaret Leszczynska
7. Unknown (laptop used to connect to server)

The following Forefront computers were imaged in connection with the North Carolina Mutual litigation:

1. Bradley Reifler
2. Paolla Camargo

There were also 13 (apparently) unused computers at Lexington Avenue, as to which we do not know if the computer was used previously by Forefront or by other entities. Only seven of these computers had hard drives. Those hard drives have been collected and are secured in the NY office of K&L Gates.

Forefront also had various tenants in its space over time that were not employees or affiliates of Forefront. The current and/or most recent ones to utilize portions of the office space or different desks are as follows. The numbers of computers identified are approximate.

- Cifco International Group / Lawrence Tian - has two computers present, which remain onsite in a locked office to which Forefront does not have access. We expect Mr. Tian will be taking these computers in the next couple weeks.
- Stephanie Phillips (trading execution business) - has one computer, which remains onsite. We expect she will be taking her computer this week.

- Ruyi / William Yeh (trading firm) - had approximately 20 computers (some in use and some not) and one server tower. As previously mentioned, this firm moved out last week and took all of its equipment.
- Tom Lisa (looks for investment opportunities, primarily in oil and gas) - has one desk with a computer present. He is not an employee of Forefront, but did use a Forefront email address. Forefront is attempting to get in contact with him about his computer; otherwise it will be deemed “abandoned” and we can address its disposition and possible production as part of our dialogue with your office.
- David Katz (investment opportunities, focused on insurance wrapped opportunities) - had one desk, which has an “abandoned” computer.
- Sumehr Sondhi (investment publication directed to high net worth individuals) - had one computer onsite at some point, but it has been removed.
- Javier Sumavielle (Auto Funding Group) - has one desk; had one computer present, but it reportedly was moved out a few months ago.
- Aliona Boneva (Stenn, hedge fund in the United Kingdom) - had one computer; she has moved out with her computer, although I understand we have an ability to contact her if needed.
- Shaya Prager and Harvey Feldheim (real estate developers) - they have moved out; they had three desks but no computers are present.

Other non-Forefront entities or persons who formerly occupied part of Forefront’s space, but who no longer have computers or workstations there include:

- Robert Wolf - eight desks
- Rodney Omanoff (partner at Talking Capital)
- Dennis Freulinghiusen (worked for Joel Schreiber at one point; investment opportunities)
- Russel Amnuth (hedge fund trader)
- Doug Altshuler (traded personal capital)
- Dave Aronowitz (worked on African cellular company)
- Jeff Ervin (technology company)
- Tom Watts (broker-dealer Watts Capital)
- Fatos Mucha (investment opportunities; focused on biotech, Albanian projects, real estate)
- Michael Halperin (took over Forefront Wealth Management, an equity execution business)
- Martel (broker-dealer owned by David Wasitowski; held licenses for Alan Feldman and Frank Argenziano at some point)
- Tom Ivanyi (investment banking)
- Harvey Korofski (various businesses)
- Paul Lisiak (banker specializing in the consumer sector)

**Second**, with respect to your question on Forefront-related entities, my firm represents Forefront Capital Holdings LLC, the current parent holding company. Its wholly-owned subsidiaries include:

- Forefront Capital Markets LLC
- Forefront Capital Services LLC
- Forefront Advisors LLC
- Forefront Partners LLC
- Forefront Capital Advisors LLC

As I noted on the phone, there are several entities that apparently are not operational and therefore my firm has not been actively involved with them. This includes a former holding company (Forefront Management Group LLC) and subsidiary (Forefront Capital Management LLC). To the extent you have questions about any such entities, you can direct them to us and we will endeavor to get back to you promptly with respect to whether we represent the entities.

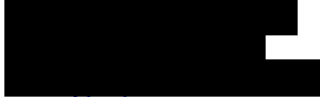
There also are some entities with Forefront-related names that we do not represent, including the registered investment company (Forefront Income Trust) and Forefront Wealth Management, which was sold approximately two years ago.

I will write under separate cover with an update and expected timeline with respect to the document collection.

Thanks,  
Ted



**Theodore L. Kornobis**  
K&L Gates LLP  
1601 K Street, NW  
Washington, DC 20006



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[REDACTED]

[REDACTED]

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**From:** Kornobis, Ted [REDACTED]  
**Sent:** Monday, April 2, 2018 9:15 PM  
**To:** Hankey, Kyle (CRM) [REDACTED]; Pascucci, Michelle (CRM) [REDACTED]  
**Cc:** Topetzes, Stephen G. [REDACTED]  
**Subject:** Forefront - Update on Document Collection Efforts

Kyle and Michelle,

I am writing to provide an update on the Forefront document collection efforts. I have summarized the status and expected timeframe in the below chart. As noted below, in order to hopefully speed things up, we are considering Haystack taking physical possession of the server and the NAS units once the current copying concludes (expected to finish tomorrow). We are figuring out logistics and how this may impact the bankruptcy litigation, however, and will provide a further update.

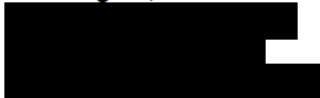
Category	Status	Timetable
Server	Logical copy is in final stages of copying.  Physical copy to begin after logical copy finishes. We are considering whether it will be faster and more efficient for Haystack to take physical possession of the server once the logical copy finishes, and then make the physical copy in a Haystack lab environment.	Logical copy expected to complete by April 3.  Physical copy: Copying expected to take 3-7 days. We are working on scheduling physical collection of the server.
NAS Units (2)	We do not have access credentials to these. One of the devices is familiar to the former Forefront IT consultant (Dave Savage) and we are trying to determine if he can access it; the other device is unknown.  We plan to take physical possession of these units while we try to determine how best to access the data on them.	We are working on scheduling physical collection of the NAS units.
Computers - Forefront-	Haystack has imaged seven devices total.	Initial collection efforts complete.  We will determine plans to make an additional image of the

confirmed devices	Two other devices were imaged by the North Carolina Mutual vendor.	devices that were copied by the North Carolina Mutual vendor.
Computers - Other devices onsite	The seven hard drives for unknown computers at Forefront's offices have been securely stored at the K&L Gates NY office.  K&L Gates has provided DOJ with an inventory of computers from non-Forefront tenants.	The seven hard drives have been collected.
Email - Office365	The majority of email custodians have been copied. We are working to obtain necessary licenses to collect the remaining (approximately eight) custodians.	Copying process should take 1-2 days for the remaining mailboxes. Expect to have licenses resolved April 3.
Email - Smarsh	Smarsh will not release the data to Forefront given that the defunct broker-dealer has an accounts-receivable charge outstanding.  K&L Gates to discuss options with DOJ.	
Email - GlobalRelay	Forefront does not appear to have an account with this entity. This service appears to have been used by Forefront Wealth Management, which was sold two years ago.  K&L Gates to discuss options with DOJ. DOJ may need to seek access to this data from Forefront Wealth Management.	
B. Reifler Dropbox	In progress.	Expected to complete by April 2.
B. Reifler Gmail	In progress.	Expected to complete by April 2.

Thanks,  
Ted

**K&L GATES**

**Theodore L. Kornobis**  
K&L Gates LLP  
1601 K Street, NW  
Washington, DC 20006



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**From:** [Pascucci, Michelle \(CRM\)](#)  
**To:** [Kornobis, Ted](#); [Topetzes, Stephen G.](#)  
**Cc:** [Alexander-Hoeppner, Jessee \(CRM\)](#)  
**Subject:** RE: Follow up regarding Forefront devices  
**Date:** Thursday, September 10, 2020 2:07:28 PM

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Good morning Steve and Ted:

I wanted to circle back on this request.

Thank you,  
Michelle

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**From:** Pascucci, Michelle (CRM)  
**Sent:** Monday, August 17, 2020 8:58 AM  
**To:** Kornobis, Ted [REDACTED]; Topetzes, Stephen G.  
[REDACTED]  
**Cc:** Alexander-Hoeppner, Jessee (CRM) [REDACTED]  
**Subject:** Follow up regarding Forefront devices

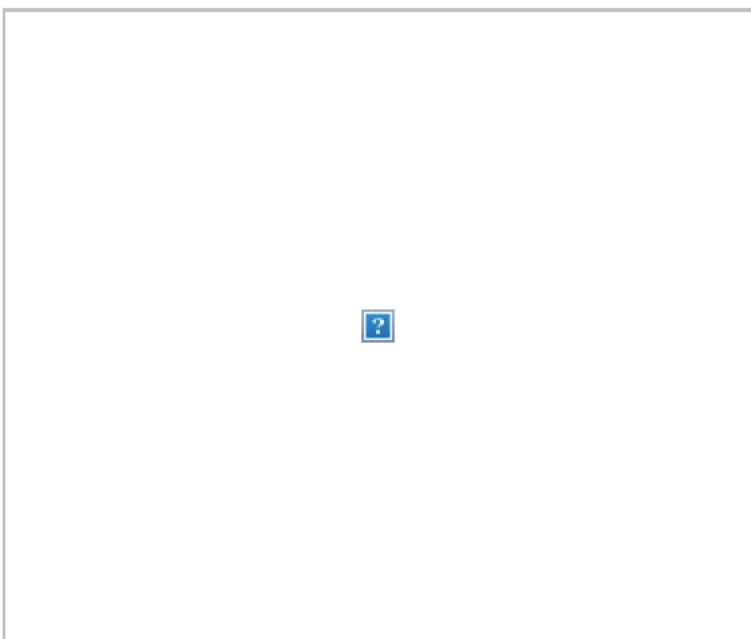
Good morning Ted and Steve:

Our IT folk are having trouble accessing one of the items provided to the Department of Justice, "Item #10," which is described as Haystack images of computers for Alisa Rusanoff and custodian Wendy Espinoza. When attempting to access the file folders, the below errors are generated. Could you either furnish a replacement or provide advice on how we might access these devices?

Best,  
Michelle

Michelle Pascucci  
Trial Attorney, Fraud Section  
1400 New York Avenue N.W.  
Washington, DC 20530  
[REDACTED]  
[REDACTED]  
[REDACTED]





**From:** [Kornobis, Ted](#)  
**To:** [Pascucci, Michelle \(CRM\)](#); [Topetzes, Stephen G.](#)  
**Cc:** [Alexander-Hoeppner, Jessee \(CRM\)](#)  
**Subject:** RE: Forefront NAS Unit Passwords  
**Date:** Thursday, August 6, 2020 9:54:41 AM

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Hi Michelle,

Unfortunately, we do not have passwords for these devices, which were original media located on-site at the Forefront offices. Haystack collected the NAS units from Forefront's offices and was planning to further investigate and/or copy them after it finished efforts to copy the Forefront server, but before that could occur we arranged delivery of the devices to DOJ per your instructions.

Please let us know if you would like any additional information.

Thanks,  
Ted

-----  
Ted Kornobis  
[REDACTED]  
[REDACTED]

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**From:** Pascucci, Michelle (CRM) [REDACTED]  
**Sent:** Tuesday, August 04, 2020 8:04 PM  
**To:** Kornobis, Ted [REDACTED]; Topetzes, Stephen G.  
[REDACTED]  
**Cc:** Alexander-Hoeppner, Jessee (CRM) [REDACTED]  
**Subject:** RE: Forefront NAS Unit Passwords

Good afternoon Steve and Ted:

I wanted to circle back on this and see if you had a password for the units.

Thank you,  
Michelle

---

**From:** Pascucci, Michelle (CRM)  
**Sent:** Friday, July 31, 2020 2:24 PM  
**To:** Kornobis, Ted [REDACTED]; Topetzes, Stephen G.  
[REDACTED]  
**Cc:** Alexander-Hoeppner, Jessee (CRM) [REDACTED]  
**Subject:** Forefront NAS Unit Passwords

Good afternoon Ted and Steve:

We hope you are doing well. We wanted to reach out because, in 2018, you had provided us two NAS Units with the production of the devices. These devices require passwords for access—could you please provide us those passwords?

Thank you,  
Michelle

Michelle Pascucci  
Trial Attorney, Fraud Section  
1400 New York Avenue N.W.  
Washington, DC 20530

[REDACTED]  
[REDACTED]  
[REDACTED]

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**From:** [Kornobis, Ted](#)  
**To:** [Pascucci, Michelle \(CRM\)](#)  
**Cc:** [Topetzes, Stephen G.](#); [Alexander-Hoepfner, Jessee \(CRM\)](#)  
**Subject:** RE: Touching base  
**Date:** Friday, June 5, 2020 5:50:10 PM  
**Attachments:** [12441\\_0004 - KL - Forefront Capital DCW.XLSX](#)

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Michelle and Jessee,

Thanks for speaking with us earlier. I am attaching the spreadsheet that we described on our call. Please let us know if you have additional questions.

Enjoy the weekend.

Ted



**Theodore L. Kornobis**  
K&L Gates LLP  
1601 K Street, NW  
Washington, DC 20006

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**From:** Kornobis, Ted [REDACTED]  
**Sent:** Friday, June 05, 2020 11:13 AM  
**To:** Pascucci, Michelle (CRM) [REDACTED]  
**Cc:** Topetzes, Stephen G. [REDACTED]; Alexander-Hoepfner, Jessee (CRM) [REDACTED]  
**Subject:** RE: Touching base

Yes, that works. Thanks very much for accommodating. We can use the same dial-in.

-----  
Ted Kornobis

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**From:** Pascucci, Michelle (CRM) [REDACTED]  
**Sent:** Friday, June 05, 2020 10:42 AM  
**To:** Kornobis, Ted [REDACTED]  
**Cc:** Topetzes, Stephen G. [REDACTED]; Alexander-Hoepfner, Jessee (CRM) [REDACTED]

**Subject:** Re: Touching base

Hi Ted,

Would 5pm work for you?

Best,  
Michelle

On Jun 5, 2020, at 10:30 AM, Kornobis, Ted [REDACTED] wrote:

Hi Michelle,

I'm very sorry, but I have just had a conflict arise at 1pm that I unfortunately cannot move. Is there a time later in the day (3pm or later) that works for you both?

Thanks,  
Ted

-----  
Ted Kornobis  
[REDACTED]  
[REDACTED]

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**From:** Pascucci, Michelle (CRM) [REDACTED]  
**Sent:** Wednesday, June 03, 2020 9:10 PM  
**To:** Kornobis, Ted [REDACTED]  
**Cc:** Topetzes, Stephen G. [REDACTED]; Alexander-Hoeppner, Jesse (CRM)  
[REDACTED]  
**Subject:** RE: Touching base

Thanks, Ted.

---

**From:** Kornobis, Ted [REDACTED]  
**Sent:** Wednesday, June 3, 2020 8:28 PM  
**To:** Pascucci, Michelle (CRM) [REDACTED]  
**Cc:** Topetzes, Stephen G. [REDACTED]; Alexander-Hoeppner, Jesse (CRM)  
[REDACTED]  
**Subject:** RE: Touching base

Yes, that works for us. We can use the following:

[REDACTED]  
[REDACTED]

-----  
Ted Kornobis

[REDACTED]  
[REDACTED]

---

**From:** Pascucci, Michelle (CRM) [REDACTED]  
**Sent:** Wednesday, June 03, 2020 9:25 AM  
**To:** Kornobis, Ted [REDACTED]  
**Cc:** Topetzes, Stephen G. [REDACTED]; Alexander-Hoeppner, Jessee (CRM)  
[REDACTED]  
**Subject:** Re: Touching base

Ted,

Would 1pm Friday work?

Best,  
Michelle

On Jun 3, 2020, at 8:47 AM, Kornobis, Ted [REDACTED] wrote:

Michelle,

My apologies for the delayed response. Unfortunately 11am does not work for us. Are you available any times on Friday afternoon?

Thanks,  
Ted

-----  
Ted Kornobis

[REDACTED]  
[REDACTED]

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**From:** Pascucci, Michelle (CRM) [REDACTED]  
**Sent:** Monday, June 01, 2020 8:33 PM  
**To:** Kornobis, Ted [REDACTED]  
**Cc:** Topetzes, Stephen G. [REDACTED]; Alexander-Hoeppner, Jessee (CRM)  
[REDACTED]  
**Subject:** Re: Touching base

Hi Ted:

Thanks for the update. We will let you know if that password works.

Would 11am on Wednesday work for you both to discuss?

Best,  
Michelle

On Jun 1, 2020, at 7:23 PM, Kornobis, Ted [REDACTED] wrote:

Hi Michelle,

I hope you had a nice weekend. I believe we have located the correct password for the different drives you identified. Can you please try the following and let me know if that works for these devices: **FOR-20180323**. With respect to the inventory spreadsheet, I am still tracking that down and will update you. Are you both available for a call later this week?

Thanks,  
Ted

-----  
Ted Kornobis

[REDACTED]  
[REDACTED]

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**From:** Pascucci, Michelle (CRM) [REDACTED]  
**Sent:** Thursday, May 28, 2020 1:57 PM  
**To:** Kornobis, Ted [REDACTED]; Topetzes, Stephen G.  
[REDACTED]  
**Cc:** Alexander-Hoeppner, Jessee (CRM) [REDACTED]  
**Subject:** RE: Touching base

Hi Ted,

Thank you so much. We are happy to get on the line to discuss, just let us know what times work for you.

Best,  
Michelle

---

**From:** Kornobis, Ted [REDACTED]  
**Sent:** Thursday, May 28, 2020 1:36 PM

**To:** Pascucci, Michelle (CRM) [REDACTED]; Topetzes, Stephen G.  
[REDACTED]  
**Cc:** Alexander-Hoeppner, Jesse (CRM) [REDACTED]  
**Subject:** RE: Touching base

Hi Michelle,

We're looking back on our files on this. I will aim to get back to you further tomorrow or Monday, and it may make sense to set up a short call.

Thanks,  
Ted

-----  
Ted Kornobis  
[REDACTED]

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**From:** Pascucci, Michelle (CRM) [REDACTED]  
**Sent:** Wednesday, May 27, 2020 12:21 PM  
**To:** Topetzes, Stephen G. [REDACTED]; Kornobis, Ted  
[REDACTED]  
**Cc:** Alexander-Hoeppner, Jesse (CRM) [REDACTED]  
**Subject:** RE: Touching base

Hi Ted and Steve,

I wanted to circle back on this email below. Do you have any updates on the password inquiry or our question regarding Haystack?

We are happy to get on the line if it's easier to discuss.

Thank you,  
Michelle

---

**From:** Pascucci, Michelle (CRM)  
**Sent:** Wednesday, May 20, 2020 3:35 PM  
**To:** Topetzes, Stephen G. [REDACTED]; Kornobis, Ted  
[REDACTED]  
**Cc:** Alexander-Hoeppner, Jesse (CRM) [REDACTED]  
**Subject:** RE: Touching base



Hi Ted and Steve:

I wanted to follow up to see whether you had any updates on providing a report from Haystack regarding the devices that were produced to us in April 2018.

Could you also provide passwords for all the devices? We have been using the passwords copied below but they have not been working for devices #1, #4, #10, #11, #12, and #16.

kyleMICHE11E  
F0refr0nt590  
Welcome641!

Thank you,

Michelle Pascucci  
Trial Attorney, Fraud Section  
1400 New York Avenue N.W.  
Washington, DC 20530

[REDACTED]  
[REDACTED]  
[REDACTED]

---

**From:** Topetzes, Stephen G. [REDACTED]  
**Sent:** Tuesday, May 5, 2020 6:37 PM  
**To:** Pascucci, Michelle (CRM) [REDACTED]; Kornobis, Ted  
[REDACTED]  
**Cc:** Cottingham, Caitlin (CRM) [REDACTED]; Alexander-Hoeppner, Jessee (CRM) [REDACTED]  
**Subject:** RE: Touching base

Yes, 4:30 p.m. tomorrow is fine. Thank you.

Steve

[<image001.jpg>](#)

**Stephen G. Topetzes**  
Partner  
K&L Gates LLP  
1601 K Street, NW  
Washington, DC 20006

[www.klgates.com](http://www.klgates.com)

---

**From:** Pascucci, Michelle (CRM) [REDACTED]  
**Sent:** Tuesday, May 05, 2020 2:28 PM  
**To:** Topetzes, Stephen G. [REDACTED]; Kornobis, Ted  
[REDACTED]  
**Cc:** Cottingham, Caitlin (CRM) [REDACTED]; Alexander-Hoeppner, Jessee (CRM)  
[REDACTED]  
**Subject:** RE: Touching base

Steve: Would tomorrow at 4:30pm work? If so, I can circulate a dial-in.

---

**From:** Topetzes, Stephen G. [REDACTED]  
**Sent:** Tuesday, May 5, 2020 1:10 PM  
**To:** Pascucci, Michelle (CRM) [REDACTED]; Kornobis, Ted  
[REDACTED]  
**Cc:** Cottingham, Caitlin (CRM) [REDACTED]; Alexander-Hoeppner, Jessee  
(CRM) [REDACTED]  
**Subject:** RE: Touching base

Sorry for the delay, Michelle. Yes, of course. Are you available tomorrow afternoon or Thursday afternoon?

I hope you all are safe and well. Thank you.

Steve

[<image001.jpg>](#)

**Stephen G. Topetzes**  
Partner  
K&L Gates LLP  
1601 K Street, NW  
Washington, DC 20006  
[REDACTED]

[REDACTED]  
[REDACTED]  
[www.klgates.com](http://www.klgates.com)

---

**From:** Pascucci, Michelle (CRM) [REDACTED]  
**Sent:** Monday, May 04, 2020 1:10 PM  
**To:** Kornobis, Ted [REDACTED]; Topetzes, Stephen G.  
[REDACTED]  
**Cc:** Cottingham, Caitlin (CRM) [REDACTED]; Alexander-Hoeppner, Jessee (CRM)  
[REDACTED]  
**Subject:** RE: Touching base

Ted and Steve—

I wanted to circle back on this and see if you would have a moment to get on the line this week.

Thank you,  
Michelle

Michelle Pascucci  
Trial Attorney, Fraud Section  
1400 New York Avenue N.W.  
Washington, DC 20530

[REDACTED]  
[REDACTED]  
[REDACTED]

---

**From:** Pascucci, Michelle (CRM)  
**Sent:** Friday, April 10, 2020 5:53 PM  
**To:** Kornobis, Ted [REDACTED]; Topetzes, Stephen G.  
[REDACTED]  
**Cc:** Caitlin Cottingham (CRM) [REDACTED]  
[REDACTED]; Alexander-Hoeppner, Jessee (CRM) [REDACTED]  
[REDACTED]  
**Subject:** Touching base

Ted and Steve:

I hope you both are staying safe during this time. Would you have a moment to connect early next

week? We had a question about the production of devices you provided us in April 2018.

Thank you,  
Michelle

Michelle Pascucci  
Trial Attorney, Fraud Section  
1400 New York Avenue N.W.  
Washington, DC 20530

[REDACTED]  
[REDACTED]  
[REDACTED]

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